

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of )  
 )  
Local Number Portability ) CC Docket No. 95-116  
Phase III Implementation )

**PETITION FOR WAIVER**

Teleport Communications Group Inc. ("TCG") hereby requests a waiver of the Phase III implementation schedule for deployment of local number portability ("LNP") in the Denver, Portland, Oakland, San Francisco, Nashville, and Charlotte MSAs.<sup>1</sup> The Phase III implementation date established by the Commission for implementing such number portability is June 30, 1998. TCG requests a waiver of the Commission's deadline pursuant to Section 52.23(e) of the Commission's Rules.<sup>2</sup> Extension of the Phase I implementation schedule recently was granted based on identical facts.<sup>3</sup>

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1. See 47 C.F.R. § 52.31(d) and Appendix.

2. 47 C.F.R. § 52.23(e).

3. Telephone Number Portability; Petitions for Extension of the Deployment Schedule for Long-Term Database Methods for Local Number Portability, Phase I, CC Docket No. 95-116, Order, DA 98-614 (Network Serv. Div. rel. March 31, 1998).

*OTG*

## **I. DENVER AND PORTLAND MSAs**

### Sections 52.23(e)(1) and (2)

TCG is a member of the limited liability corporation group of carriers for the Western region and has participated in the process of evaluating RFP responses for local number portability administrators for the Denver and Portland MSAs and in choosing a vendor. TCG is dependent on the vendor chosen to provide a stable platform to support local number portability. As TCG reported in its recent Petition for Waiver regarding the Phase II implementation date, the vendor that had been chosen for this regions, Perot Systems, was unable to provide that stable platform, which "significantly affected" local number portability deployment in the Southeast, Western, and West Coast regions.<sup>4</sup> Therefore, it was necessary to select, and make arrangements with, a new vendor. The Western LLC Carrier Group selected a new vendor, Lockheed Martin, to provide the required platform. The change in vendors has made it impossible for the new vendor to have the system ready for implementation.

### Section 52.23(e)(3)

The CLLI code for the affected switches are as follows:

Denver, CO - AURRCOBUDS0

Portland, OR - TGRDORAODS0

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4. See Letter from Alan Hasselwander, Chairman, North American Numbering Council, to A. Richard Metzger, Jr., Chief, Common Carrier Bureau, FCC (dated January 21, 1998); see also TCG Petition for Waiver (Phase II Implementation), CC Docket No. 95-116 (filed March, 13, 1998).

Sections 52.23(e)(4) and (5)

TCG remains in regular contact with Lockheed regarding LNP implementation. However, no date has been set yet for the LNP activation date, which will require coordination among all the participating carriers. Thus, TCG anticipates that the extension it requires will conform with any extension requested by US West for Phase III LNP implementation.

**II. OAKLAND AND SAN FRANCISCO MSAs**

Sections 52.23(e)(1) and (2)

For the same reasons stated above, the previous vendor was recently replaced by Lockheed for the West Coast region. The change in vendors has made it impossible for the new vendor to have the system ready for implementation.

Section 52.23(e)(3)

The CLLI code for the affected switches are as follows:

Oakland, CA - OKLDCAUNDS0

San Francisco, CA - SNFCCAFJDS0

Sections 52.23(e)(4) and (5)

TCG remains in regular contact with Lockheed regarding LNP implementation. However, no date has been set yet for the LNP activation date, which will require coordination among all the participating carriers. Thus, TCG anticipates that the extension it requires will conform with any extension requested by Pacific Bell for Phase III LNP implementation.

**III. NASHVILLE AND CHARLOTTE MSAs**

Sections 52.23(e)(1) and (2)

For the same reasons stated above, the previous vendor was recently replaced by Lockheed for the Southeast region. The change in vendors has made it impossible for the new vendor to have the system ready for implementation.

Section 52.23(e)(3)

The CLLI code for the affected switches are as follows:

Nashville, TN - NSVLTN48DS0

Charlotte, NC - CHRLNCNADS0

Sections 52.23(e)(4) and (5)

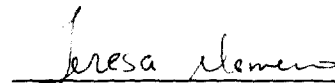
TCG remains in regular contact with Lockheed regarding LNP implementation; however, no firm date has been set for testing. Similarly, no date has been set for LNP activation, which will require coordination among all the participating carriers. Thus, TCG anticipates that the extension it requires will

conform with any extension requested by BellSouth for Phase III LNP implementation.

Based upon the foregoing circumstances beyond its control, TCG requests a waiver of the June 30, 1998 deadline for LNP implementation in the Denver, Portland, Oakland, San Francisco, Nashville, and Charlotte MSAs.

Respectfully submitted,

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Dated: May 1, 1998

CERTIFICATE OF SERVICE

I, Dottie E. Holman, hereby certifies that on this 1st day of May, 1998, have caused a copy of the foregoing PETITION FOR WAIVER to be served via hand delivery, upon the persons listed below:

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